

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RITA RODIN-JOHNSTON,

Plaintiff,

-against-

HOTEL LES ATELIERS DE L'IMAGE, SARL
GODARD FRANCE ASSOCIES, ALAIN
GODARD, FRANCINE GODARD, and
JEROME GODARD,

Defendants.

11 Civ. 00638 (GBD/RLE)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion to Dismiss, dated February 9, 2011, the accompanying Declaration of Alain Godard, dated February 3, 2011; the accompanying Declaration of Jean-Christophe Pic, dated February 8, 2011; and upon all pleadings and proceedings had herein, Defendants Hotel Les Ateliers de L'Image, SARL Godard France Associés, Alain Godard, Francine Godard, and Jerome Godard (collectively, "Defendants"), will move this Court before the Honorable George B. Daniels, United States District Judge at the United States Courthouse, 500 Pearl Street, New York, New York 10007 on a date and time to be set by the Court, for an Order dismissing the Complaint for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2), *forum non conveniens* pursuant to Fed. R. Civ. P. 12(b)(3), and/or failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6), and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 9, 2011

OLSHAN GRUNDMAN FROME
ROSENZWEIG & WOLOSKY LLP

By: /s/ Allen R. Wolff
Peter D. Weinstein (AW 5876)
Allen R. Wolff
Attorneys for Defendants
Park Avenue Tower
65 East 55th Street
New York, New York 10022
(212) 451-2300